REMARKS/ARGUMENTS

Claims 1, 3, and 4 are pending in the present application.

This Amendment is in response to the Office Action mailed December 15, 2010. In the Office Action, the Examiner rejected claims 1-4 under 35 U.S.C. §102(b). Reconsideration in light of the remarks made herein is respectfully requested.

Rejection Under 35 U.S.C. § 102

In the Office Action, the Examiner rejected claims 1, 3, and 4 under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 6,127,970 issued to Lin ("Lin"). Applicant respectfully traverses the rejection and submits that the Examiner has not met the burden of establishing a *prima facie* case of anticipation.

Lin fails to disclose, at least, (1) an interface standard model for converting data transmitted from the satellite subsystem standard model and the flight software module; and (2) the interface standard model includes data processing information and data link information, and wherein the data processing information and the data link information are modified when the satellite subsystems standard model is changed, the data processing information being at least one of a data format, a data structure and a data attribute, as recited in independent claim 1.

In the Office Action, the Examiner alleges the following correspondences (Office Action, page 3-4):

Claim 1	Lin
"a satellite subsystem standard model"	Integrated GPS/INS system 30
"a flight software module"	6DOF trajectory generator 10
"an interface standard model"	Real time GPS/IMU emulator 20

Applicant respectfully disagrees for the following reasons:

(1) an interface standard model for converting data transmitted from the satellite subsystem standard model and the flight software module

Lin merely discloses that a real time trajectory data is produced from the 6DOF trajectory generator 10 and is sent to the coupled real time GPS/IMU emulation system 20. The coupled

real time GPS/IMU emulation system 20 produces dynamic real GPS measurements and IMU signal which are formatted and processed to produce simulated GPS measurements and IMU simulated electronic signal which are in turn injected into the integrated GPS/INS system 30 (Lin, col. 6, line 63 to col. 7, line 25; Figure 1).

In contrast, the claim recites "an interface standard model for converting data transmitted from the satellite subsystem standard model and the flight software module." *Emphasis Added.* Given that the coupled real time GPS/IMU emulation system 20 provides GPS measurements and IMU signals to the integrated GPS/INS system 30, which the Examiner alleges to be "the satellite subsystem standard model," the coupled real time GPS/IMU emulation system 20 does not convert "data transmitted from the satellite subsystem standard model." In other words, the GPS measurements and the IMU signals being sent to the integrated GPS/INS system 30 (allegedly "the satellite subsystem standard model") are not the same as data transmitted from the integrated GPS/INS system 30.

Accordingly, since the coupled real time GPS/IMU emulation system 20 does not convert data transmitted from the satellite subsystem standard model, the coupled real time GPS/IMU emulation system 20 cannot correspond to the interface standard model, as delineated in the claim.

In the Response to Argument Section of the Office Action, the Examiner merely reasserted that Lin discloses "an interface standard model for converting data transmitted from the satellite subsystem standard model and the flight software module," and cited the same portion of Lin which allegedly teaches this element and further states "Figure 2 show[s] how item 10's (flight software module) output is converted into data useable by item 30 (satellite subsystem model)" (Office Action, pages 7-8). Applicant submits that the Examiner ignores the language of the claims which recites "an interface standard model for converting data transmitted from the satellite subsystem standard model and the flight software module." *Emphasis Added.* In the Office Action, the Examiner alleges the following correspondences:

Claim 1	Lin
"a satellite subsystem standard model"	Integrated GPS/INS system 30
"a flight software module"	6DOF trajectory generator 10
"an interface standard model"	Real time GPS/IMU emulator 20

Applicant submits that even if 6DOF trajectory generator 10's output is converted into data usable by Integrated GPS/INS system 30 in Lin, the argument that Applicant has set forth is that the Real time GPS/IMU emulator 20 (allegedly, "an interface standard model") does not convert data transmitted from Integrated GPS/INS system 30 (allegedly, "a satellite subsystem standard model"), as illustrated in Figure 1 of Lin. In other words, even if item 10 sends data to item 30, that does not teach that item 30 sends data to item 20.

Accordingly, Lin fails to teach this element of the claims.

(2) the interface standard model includes data processing information and data link information,... the data processing information being at least one of a data format, a data structure and a data attribute

Further, independent claim 1 recites "the interface standard model includes data processing information and data link information," and "the data processing information and the data link information are modified when the satellite subsystems standard model is changed." As discussed above, the coupled real time GPS/IMU emulation system 20, cannot be the interface standard model and the integrated GPS/INS system 30 cannot be the satellite subsystems standard model. Even assuming coupled real time GPS/IMU emulation system 20 is the same as the interface standard model, there is no teaching that the coupled real time GPS/IMU emulation system 20 includes data processing information and data link information.

In the Response to Arguments Section of the Office Action, the Examiner maintains that Lin discloses the coupled real time GPS/IMU emulation system 20, allegedly "the interface standard model...includes data processing information and data link information..., the data processing information being at least one of a data format, a data structure and a data attribute" because Lin discloses:

> "The Ethernet network controller board 21, as shown in FIG. 2, is used to receive real time vehicle flight trajectory data from the 6DOF trajectory generator 10. The 6DOF trajectory generator 10 and the real time IMU emulation system 20 can also be connected by a standard serial communication port such as RS-422/485, according to the application requirement." (Lin, col. 12, lines 54-60).

The Examiner alleges that "the data link information is inherent in the communication system used by Lin, and the data processing information is just the data passed on to the various

components as necessary [in Lin], and this data is one of a data format, a data structure or a data attribute" (Office Action, pages 8-9).

Applicant respectfully disagrees and submits that *inter alia* there is no teaching in Lin of "the data passed on to the various components" (allegedly, "the data processing information") "being at least one of a data format, a data structure and a data attribute." Under 35 U.S.C. §102, "[a] person shall be entitled to a patent unless (a) the invention was known or used by others in this country, or patented or described in a printed publication in this or a foreign country, before the invention thereof by the applicant for a patent." *Emphasis Added.* Accordingly, to anticipate a claim, "the identical invention must be shown in as complete detail as is contained in the...claim." Richardson v. Suzuki Motor Co., 868 F.2d 1226, 1236, 9 USPQ 2d 1913, 1920 (Fed. Cir. 1989).

Here, the Examiner failed to show *inter alia* that the coupled real time GPS/IMU emulation system 20 in Lin (allegedly, "the interface standard model) includes data processing information and data link information and the data processing information being at least one of a data format, a data structure and a data attribute. Instead, Applicant submits that the Examiner makes conclusory statements such as "the data processing information is just the data passed on to the various components as necessary, and this data is one of a data format, a data structure or a data attribute" without showing proper support in Lin. Thus, given that Lin does not teach that which the Examiner's alleges and the Examiner further supports this rejection using conclusory statements, Applicant submits that the Examiner's rejection under §102 is improper.

Accordingly, Applicant submits that claims 1, 3 and 4 are distinguishable from the cited reference such that the rejection under §102 should be withdrawn.

To anticipate a claim, the reference must teach every element of a claim. "A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." Vergegaal Bros. v. Union Oil Co. of California, 814 F.2d 628, 631, 2 USPQ 2d 1051, 1053 (Fed. Cir. 1987). "The identical invention must be shown in as complete detail as is contained in the...claim." Richardson v. Suzuki Motor Co., 868 F.2d 1226, 1236, 9 USPQ 2d 1913, 1920 (Fed. Cir. 1989). Since the Examiner failed to show that Lin teaches or discloses any one of the above elements, the rejection under 35 U.S.C. §102 is improper.

Therefore, Applicant believes that independent claim 1 and dependent claims 3 and 4 are distinguishable over the cited prior art references. Accordingly, Applicant respectfully requests the rejection under 35 U.S.C. §102(b) be withdrawn.

Conclusion

Applicant respectfully requests that a timely Notice of Allowance be issued in this case.

Respectfully submitted,

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